

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No.: 1:19-cv-04515-SDG

\$21,865.00 IN UNITED STATES  
CURRENCY; and \$20,000.00 IN  
UNITED STATES CURRENCY,

Defendant.

**CLAIMANT LEMARCUS ALLISON'S VERIFIED CLAIM AND ANSWER  
TO COMPLAINT FOR FORFEITURE**

Claimant, LeMarcus Allison, by and through undersigned counsel, in the above entitled civil cause of action for forfeiture, answers the Complaint for Forfeiture as follows:

**I. CLAIM**

1. Pursuant to Rule G(5) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims, and within a timely manner, Claimant files his verified claim with the Clerk of this honorable Court.
2. Pursuant to Rule G(5)(a)(i)(A), Claimant identifies the specific property claimed in this matter as defendant \$21,865.00 and defendant \$20,000.00.
3. Pursuant to Rule G(5)(a)(i)(B), Claimant is identified as LeMarcus Allison ("Mr.

Allison or Claimant”). Mr. Allison’s interest in the property stems from his ownership of the property. Mr. Allison is the owner of several businesses – one of which is rental real estate. Mr. Allison is also the owner of several single-family residence homes. In 2016, the adjusted gross income for Mr. Allison’s businesses was \$115,735.00. In 2017, the adjusted gross income for Mr. Allison’s businesses was \$124,549.00. In 2018, the adjusted gross income for Mr. Allison’s businesses was \$170,880.00. In April 2019 Mr. Allison conveyed his property in the total amount of around \$41,865.00 to an agent to facilitate the purchase of real estate. The DEA seized Mr. Allison’s property despite the lack of any crime having been committed.

4. Pursuant to Rule G(5)(a)(i)(C), Claimant has signed his claim under penalty of perjury and serves said claim pursuant to Rule G(5)(a)(i)(D).

## **II. ANSWER**

### *a. Introduction*

1. In answer to paragraph 1 of the Complaint for Forfeiture, Claimant admits the allegations in paragraph 1 but lacks information on which to form a response with regard to the identity of the Special Agent who seized the Defendant \$21,865.00.
2. In answer to paragraph 2 of the Complaint for Forfeiture, Claimant admits the allegations in paragraph 2 but lacks information on which to form a response with

regard to the identity of the Special Agent who seized the Defendant \$20,000.00.

3. In answer to paragraph 3 of the Complaint for Forfeiture, Claimant admits the allegations contained in paragraph 3.

4. In answer to paragraph 4 of the Complaint for Forfeiture, Claimant admits the allegations contained in paragraph 4.

5. In answer to paragraph 5 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

*b. Forfeiture Statutes*

6. Paragraph 6 contains a legal conclusion to which no response is required.

7. Paragraph 7 contains a legal conclusion to which no response is required.

8. Paragraph 8 contains a legal conclusion to which no response is required.

9. Paragraph 9 contains a legal conclusion to which no response is required.

10. Paragraph 10 contains a legal conclusion to which no response is required.

11. Paragraph 11 contains a legal conclusion to which no response is required.

12. Paragraph 12 contains a legal conclusion to which no response is required.

*c. Basis for Forfeiture*

13. In answer to paragraph 13 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response

and leaves Plaintiff to its proofs.

14. In answer to paragraph 14 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

15. In answer to paragraph 15 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

16. In answer to paragraph 16 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

17. In answer to paragraph 17 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

18. In answer to paragraph 18 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

19. In answer to paragraph 19 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

20. In answer to paragraph 20 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

21. In answer to paragraph 21 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

22. In answer to paragraph 22 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

23. In answer to paragraph 23 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

24. In answer to paragraph 24 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

25. In answer to paragraph 25 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

26. In answer to paragraph 26 of the Complaint for Forfeiture, Claimant neither

admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

27. In answer to paragraph 27 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

28. In answer to paragraph 28 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

29. In answer to paragraph 29 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

30. In answer to paragraph 30 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

31. In answer to paragraph 31 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

32. In answer to paragraph 32 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response

and leaves Plaintiff to its proofs.

33. In answer to paragraph 33 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

34. In answer to paragraph 34 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

35. In answer to paragraph 35 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

36. In answer to paragraph 36 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

37. In answer to paragraph 37 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

38. In answer to paragraph 38 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

39. In answer to paragraph 39 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

40. In answer to paragraph 40 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

41. In answer to paragraph 41 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

42. In answer to paragraph 42 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

43. In answer to paragraph 43 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

44. In answer to paragraph 44 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

45. In answer to paragraph 45 of the Complaint for Forfeiture, Claimant neither



admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

46. In answer to paragraph 46 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

47. In answer to paragraph 47 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

48. In answer to paragraph 48 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

49. In answer to paragraph 49 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

50. In answer to paragraph 50 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

51. In answer to paragraph 51 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response

and leaves Plaintiff to its proofs.

52. In answer to paragraph 52 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

53. In answer to paragraph 53 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

54. In answer to paragraph 54 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

55. In answer to paragraph 55 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

56. In answer to paragraph 56 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

57. In answer to paragraph 57 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

58. In answer to paragraph 58 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

59. In answer to paragraph 59 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

60. In answer to paragraph 60 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

61. In answer to paragraph 61 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

62. In answer to paragraph 62 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

63. In answer to paragraph 63 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

64. In answer to paragraph 64 of the Complaint for Forfeiture, Claimant neither

admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

65. In answer to paragraph 65 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

66. In answer to paragraph 66 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

67. In answer to paragraph 67 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

68. In answer to paragraph 68 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

69. In answer to paragraph 69 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

70. In answer to paragraph 70 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response

and leaves Plaintiff to its proofs.

71. In answer to paragraph 71 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

72. In answer to paragraph 72 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

73. In answer to paragraph 73 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

74. In answer to paragraph 74 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

75. In answer to paragraph 75 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

76. In answer to paragraph 76 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

77. In answer to paragraph 77 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

78. In answer to paragraph 78 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

79. In answer to paragraph 79 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

80. In answer to paragraph 80 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

81. In answer to paragraph 81 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

82. In answer to paragraph 82 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

83. In answer to paragraph 83 of the Complaint for Forfeiture, Claimant neither

admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

84. In answer to paragraph 84 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

85. In answer to paragraph 85 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

86. In answer to paragraph 86 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

87. In answer to paragraph 87 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

88. In answer to paragraph 88 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

89. In answer to paragraph 89 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response

and leaves Plaintiff to its proofs.

90. In answer to paragraph 90 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

91. In answer to paragraph 91 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

92. In answer to paragraph 92 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

93. In answer to paragraph 93 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

94. In answer to paragraph 94 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

95. In answer to paragraph 95 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.



96. In answer to paragraph 96 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

97. In answer to paragraph 97 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

98. In answer to paragraph 98 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

99. In answer to paragraph 99 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

100. In answer to paragraph 100 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

101. In answer to paragraph 101 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

102. In answer to paragraph 102 of the Complaint for Forfeiture, Claimant neither

admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

103. In answer to paragraph 103 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

104. In answer to paragraph 104 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

105. In answer to paragraph 105 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

106. In answer to paragraph 106 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

107. In answer to paragraph 107 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

108. In answer to paragraph 108 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response

and leaves Plaintiff to its proofs.

109. In answer to paragraph 109 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

110. In answer to paragraph 110 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

111. In answer to paragraph 111 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

112. In answer to paragraph 112 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

113. In answer to paragraph 113 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

114. In answer to paragraph 114 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

115. In answer to paragraph 115 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

116. In answer to paragraph 116 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

117. In answer to paragraph 117 of the Complaint for Forfeiture, Claimant admits the allegations contained in paragraph 117.

118. In answer to paragraph 118 of the Complaint for Forfeiture, Claimant neither admits or denies the allegations for lack of information on which to form a response and leaves Plaintiff to its proofs.

119. In answer to paragraph 119 of the Complaint for Forfeiture, Claimant denies the allegations contained in paragraph 119.

120. In answer to paragraph 120 of the Complaint for Forfeiture, Claimant denies the allegations contained in paragraph 120.

121. In answer to paragraph 121 of the Complaint for Forfeiture, Claimant denies the allegations contained in paragraph 121.

WHEREFORE, the Claimant, LeMarcus Allison, requests that this Court deny the request of the United States of America to decree the requested forfeiture

of the defendants and prays that defendants be returned to Claimant, as rightful owner.

### **AFFIRMATIVE DEFENSES**

1. Plaintiff has failed to sustain its burden by establishing that there was probable cause for the institution of the forfeiture action.
2. Claimant is entitled to the return of the defendant property pursuant to provisions of 21 U.S.C.A. § 881, for the reason that the defendant property was not used nor intended to be used in exchange for a controlled substance, nor does it represent the proceeds of trafficking in controlled substances, nor was it used or intended to be used to facilitate a violation of 21 U.S.C.A. §§ 801 et seq.
3. The United States is in wrongful possession of the defendant property, as it was taken in violation of law and LeMarcus Allison's constitutional rights.
4. Claimant reserves the right to amend his Affirmative Defenses as facts become known through discovery without prejudice to Plaintiff.
5. Claimant demands a trial by jury to the extent one is permissible to Claimant under Federal Rule of Civil Procedure 38.

### **PRAYER FOR RELIEF**

WHEREFORE, Claimant, LeMarcus Allison, requests the return of the defendant properties, together with any other or further relief that this Court may

deem just and proper, and together with interest, costs and disbursements of this action so wrongfully incurred by Claimant.

Respectfully submitted, this the 9<sup>th</sup> day of December 2019.

/s/ Taylor L. Leftwich

Taylor L. Leftwich

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TaylorLLeftwich@gmail.com

*Counsel for Claimant*

/s/ Dwight L. Thomas

Dwight L. Thomas

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*Counsel for Claimant*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No.: 1:19-cv-04515-SDG

\$21,865.00 IN UNITED STATES  
CURRENCY; and \$20,000.00 IN  
UNITED STATES CURRENCY,

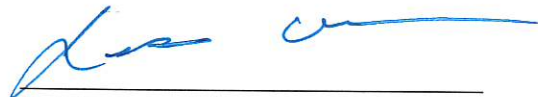
Defendant.

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**VERIFICATION OF COMPLAINT FOR FORFEITURE**

I, LeMarcus Allison, have read the Complaint for Forfeiture in this action and submitted a Claim and Answer for the same. I state under penalty of perjury that the responsive contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case.

This 9<sup>th</sup> Day of December 2019.



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LeMarcus Allison

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of CLAIMANT LEMARCUS ALLISON'S VERIFIED CLAIM AND ANSWER TO COMPLAINT FOR FORFEITURE, and all documents therewith by CM ECF to the following :

Michael J. Brown  
Assistant U.S. Attorney  
75 Ted Turner Drive, S.W.  
Suite 600  
Atlanta, GA 30303  
Michael.j.brown2@usdoj.gov

Respectfully submitted this 9<sup>th</sup> day of December 2019

/s/ Taylor L. Leftwich

Taylor L. Leftwich  
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Suite 407  
Atlanta, Georgia 30345  
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*Counsel for Claimant*

/s/ Dwight L. Thomas

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Atlanta, Georgia 30345  
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*Counsel for Claimant*